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Attorneys for Plaintiff AXS Group LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,
Plaintiff,

v.

EVENT TICKETS CENTER, INC.,
VIRTUAL BARCODE DISTRIBUTION
LLC, ALTAN TANRIVERDI, and
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**PLAINTIFF'S REQUEST TO
APPEAR REMOTELY FOR
AUGUST 7, 2024 HEARING**

Filed concurrently with Declaration of
J. Michael Keyes and [Proposed] Order

Honorable Sherilyn Peace Garnett

Date: August 7, 2024

Time: 1:30 p.m.

Courtroom: 5C

Amended Complaint filed: May 10, 2024

1 Counsel for Plaintiff AXS Group LLC (“Plaintiff” or “AXS”) hereby requests
2 permission to appear remotely via Zoom at the hearing relating to Plaintiff’s Motion
3 for Leave for Alternative Service by Email on Defendant Altan Tanriverdi (Dkt. 53),
4 which is currently scheduled for Wednesday, August 7, 2024 at 1:30 p.m.

5 Plaintiff filed its Motion for Leave for Alternative Service on Defendant Altan
6 Tanriverdi (the “Motion”) on June 21, 2024. Dkt. 53. Defendant Tanriverdi did not
7 file a response or opposition to the Motion and has not appeared in this matter. None
8 of the other Defendants—Event Tickets Center, Inc., Virtual Barcode Distribution
9 LLC, and Secure.Tickets¹—filed an opposition or response to the Motion either.
10 Keyes Decl. ¶ 3.

11 Plaintiff’s counsel has conferred with counsel for Event Tickets Center, Inc.
12 and Virtual Barcode Distribution LLC, the only counsel for Defendants to have
13 appeared in this matter. Counsel for Event Tickets Center Inc. indicated that it does
14 not oppose Plaintiff’s request to appear remotely and that they would like to observe
15 the hearing remotely as well. Keyes Decl. ¶ 5. Counsel for Virtual Barcode
16 Distribution LLC initial indicated that would not oppose this request if Plaintiff
17 granted it additional time to respond the Complaint. *Id.* ¶ 6. Plaintiff did not agree
18 to the extension and sought clarification on whether Virtual Barcode Distribution
19 LLC intends to attend the hearing or has any objection to Plaintiff’s remote
20 appearance. *Id.* ¶ 7. Counsel for Virtual Bard Distribution LLC did not respond to
21 that request. *Id.* As detailed in the Motion, Plaintiff’s counsel is unaware of any
22 counsel representing Defendant Altan Tanriverdi and, accordingly, was not able to
23 meet and confer with such counsel regarding this request.

24 Good cause exists for this request. Plaintiff’s lead counsel, J. Michael Keyes,
25 will be in Spokane, Washington on August 7 and the senior associate representing
26

27 ¹ Defendant Internet Referral Services, LLC also did not file a response or
28 opposition to the Motion. On July 22, 2024, Plaintiff filed a Notice of Voluntary
Dismissal of Defendant Internet Referral Services, LLC. Dkt. 62.

1 Plaintiff, Connor Hansen, will be in Georgetown, Texas. *Id.* ¶¶ 8-9. Travel to the
2 Court would be expensive, including flights and accommodations, and time-
3 consuming.

4 Accordingly, Plaintiff's counsel respectfully requests to appear by Zoom for
5 the August 7, 2024 hearing.

6 Dated: August 2, 2024

DORSEY & WHITNEY LLP

8 By: /s/ J. Michael Keyes
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17 *Attorneys for Plaintiff AXS Group LLC*

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281